

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**DECLARATION OF J. ALEX HALDERMAN**

J. ALEX HALDERMAN declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. In accordance with the Court's July 19, 2019 order (Doc. 463), I established a designated secure work room at the University of Michigan for the purpose of analyzing Georgia's GEMS databases.

2. Among other requirements specified in the order, security precautions for the work room include limiting access to experts or attorneys on the review team, maintaining access logs and 24-hour video surveillance of the entrance, and ensuring that computer workstations used to analyze the data are not networked or attached to the Internet. Everyone accessing the data is required to have executed a confidentiality agreement. We have also taken other prudent security precautions that go beyond the order's requirements, such as using full-disk encryption.

3. Due to campus facility constraints, I am in the process of relocating the designated work room to an equivalently secure room in a different building on the University of Michigan campus. The new room will have the same security protections. I anticipate that the relocation will be complete by Monday, August 26.

4. Should the Court permit forensic examination of disk images from election-related servers or of data from polling place equipment, I am prepared to conduct the analysis in the new secure room, in compliance with the Court's prior security requirements.

5. These precautions will provide a high degree of protection against unauthorized disclosure of the data. They are likely to result in an even higher level of security than Defendants themselves achieve, based on information that has come to light in this matter about Georgia's data security practices and election equipment handling.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 20th day of August, 2019 in Ann Arbor, Michigan.

  
J. ALEX HALDERMAN